

STATE OF KANSAS



DEPARTMENT OF HEALTH AND ENVIRONMENT

Forbes Field

Topeka, Kansas 66620-0001

Phone (913) 296-1500

Mike Hayden, *Governor*

Stanley C. Grant, Ph.D., *Secretary*

Gary K. Hulett, Ph.D., *Under Secretary*

October 23, 1987

Mr. Larry Prouty
Olin Water Services
P.O. Box 10918
Overland Park, Kansas 66210

Re: Kansas City, Kansas Facility
EPA I.D. Number KSD000203638



R00011190

RCRA Records Center

Dear Mr. Prouty:

Your May 22, 1987 request for permit modifications pursuant to 40 CFR 270, Subpart D has been reviewed. The requested modifications to the inspection frequencies and to the hazardous waste drum storage stacking height are tentatively approved. Even though the drum stacking height will be altered, the permit will still limit you to a total storage capacity of 200 55-gallon drums. All four rows of drums five pallets deep could not be completely stacked three high even with the modified permit.

In order to complete the major modification procedures, the following pages of the Part B application must be revised:

1. Section 270.14(b)(1), A general description of the facility. In the sentence beginning "Ignitable and reactive wastes...", the word "two" needs to be changed to "three".
2. Section 270.14(b)(5), General inspection schedule. Please change the inspection frequency of the condition of containers to weekly, the inspection frequency of the amount of aisle space between containers to weekly, and the inspection frequency of the condition of emergency equipment to monthly.
3. Section 270.14(b)(5), Inspection log. Page 1. The inspection frequency of the emergency equipment should be changed to monthly.

Page 2. We recommend removing the column for aisle space from the containment system inspection log and placing it on the inspection log for containers.

Page 3. The inspection frequency for containers should be changed to weekly.

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Once the modified pages are received, we will forward copies of the modifications to the Environmental Protection Agency Region VII for a 15-day period of review and comment. After the 15-day period, we will place only those conditions of your current hazardous waste storage permit which are subject to modification on public notice for 45 days. Upon completion of the 45-day public comment period and if no public comments are received, we would notify you that your hazardous waste storage permit has been modified.

Please submit these revised pages by November 20, 1987. If you have any questions, please contact me at (913) 296-1611.

Sincerely,



Janel J. Rogers
Environmental Engineer
Hazardous Waste Section
Bureau of Waste Management

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C James Fischer
Karen Flournoy ✓